

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

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In re: PROMESA  
THE FINANCIAL OVERSIGHT AND Title III  
MANAGEMENT BOARD FOR PUERTO RICO,  
as representative of No. 17 BK 3283-LTS  
THE COMMONWEALTH OF PUERTO RICO, *et* (Jointly Administered)  
*al.*

Debtors.<sup>1</sup>

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In re: PROMESA  
THE FINANCIAL OVERSIGHT AND Title III  
MANAGEMENT BOARD FOR PUERTO RICO,  
as representative of No. 17 BK 3566-LTS  
EMPLOYEES RETIREMENT SYSTEM OF THE (Joint Administration Requested)  
GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO (“ERS”),<sup>2</sup>

Debtor.

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In re: PROMESA  
THE FINANCIAL OVERSIGHT AND Title III  
MANAGEMENT BOARD FOR PUERTO RICO,  
as representative of No. 17 BK 3567-LTS  
PUERTO RICO HIGHWAYS AND (Joint Administration Requested)  
TRANSPORTATION AUTHORITY (“HTA”),<sup>3</sup>

Debtor.

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); and (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474).

<sup>2</sup> The last four (4) digits of ERS’s federal tax identification number are 9686.

<sup>3</sup> The last four (4) digits of HTA’s federal tax identification number are 3808.

**NOTICE OF FILING OF REVISED PROPOSED ORDER REGARDING  
MOTION OF DEBTORS PURSUANT TO PROMESA SECTION 301(a)  
AND BANKRUPTCY CODE SECTIONS 105(A), 362(A), 365, AND 922 FOR  
ENTRY OF ORDER CONFIRMING (I) APPLICATION OF THE AUTOMATIC  
STAY TO GOVERNMENT OFFICERS, AGENTS, AND REPRESENTATIVES, (II)  
STAY OF PREPETITION LAWSUITS AND ACTIONS AGAINST INHABITANTS  
OF PUERTO RICO, AND (III) APPLICATION OF CONTRACT PROTECTIONS**

**PLEASE TAKE NOTICE** that on June 9, 2017, the (a) Commonwealth of Puerto Rico, (b) Puerto Rico Sales Tax Financing Corporation, (c) Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and (d) Puerto Rico Highways and Transportation Authority (collectively, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico, as the Debtors’ representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* filed the *Motion of Debtors Pursuant to PROMESA Section 301(a) and Bankruptcy Code Sections 105(a), 362(a), 365, and 922 for Entry of Order Confirming (I) Application of the Automatic Stay to Government Officers, Agents, and Representatives, (II) Stay of Prepetition Lawsuits and Actions Against Inhabitants of Puerto Rico, and (III) Application of Contract Protections* [ECF No. 301] (the “Automatic Stay Confirmation Motion”). Attached as Exhibit B to the Automatic Stay Confirmation Motion is the Debtors’ initial proposed order in connection therewith (the “Initial Proposed Order”).

**PLEASE TAKE FURTHER NOTICE** that certain objections with respect to the Automatic Stay Confirmation Motion (the “Objections”)<sup>4</sup> were filed with the Court.

**PLEASE TAKE FURTHER NOTICE** that on June 24, 2017, the Debtors filed the *Omnibus Reply of Debtors to Responses to Motion of Debtors Pursuant to PROMESA Section 301(a) and Bankruptcy Code Sections 105(a), 362(a), 365, and 922 for Entry of*

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<sup>4</sup> See n. 7 in the Omnibus Reply (as defined herein) for a list of the Objections.

*Order Confirming (I) Application of the Automatic Stay to Government Officers, Agents, and Representatives, (II) Stay of Prepetition Lawsuits and Actions Against Inhabitants of Puerto Rico, and (III) Application of Contract Protections* [ECF No. 449] (the “Omnibus Reply”). Attached as Exhibit A to the Omnibus Reply is the Debtors’ first revised proposed order in connection with the Automatic Stay Confirmation Motion (the “First Revised Proposed Order”).

**PLEASE TAKE FURTHER NOTICE** that the Debtors hereby file a second revised proposed order, in the form attached hereto as Exhibit A, reflecting revisions made in an effort to resolve the remaining objection of Peaje Investments LLC (the “Second Revised Proposed Order”).

**PLEASE TAKE FURTHER NOTICE** that a redline comparing the Second Revised Proposed Order against the Initial Proposed Order is attached hereto as Exhibit B, demonstrating cumulative changes incorporated into the Second Revised Proposed Order.

**PLEASE TAKE FURTHER NOTICE** that a redline comparing the Second Revised Proposed Order against the First Revised Proposed Order is attached hereto as Exhibit C, demonstrating incremental changes incorporated into the Second Revised Proposed Order.

**PLEASE TAKE FURTHER NOTICE** that copies of the foregoing documents, and all documents filed in these title III cases are available (a) free of charge by visiting <https://cases.primeclerk.com/puertorico> or by calling +1 (844) 822-9231, and (b) on the Court’s website at <http://www.prd.uscourts.gov>, subject to the procedures and fees set forth therein.

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Dated: June 27, 2017  
San Juan, Puerto Rico

Respectfully submitted,  
/s/ Martin J. Bienenstock  
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